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Attorney for Defendant
JOSE SANTANA AYON ARAGON

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:22-CR-00178-TLN
)	
Plaintiff,)	
)	STIPULATION TO CONTINUE
vs.)	SENTENCING DATE; ORDER
)	
JOSE SANTANA AYON ARAGON)	DATE: February 13, 2025
)	TIME: 9:30 a.m.
)	COURT: Hon. Troy L. Nunley
Defendant.)	

Counsel for Defendant Jose Santana Ayon Aragon, by and through his counsel of record, Assistant Federal Defender Meghan D. McLoughlin, and Plaintiff United States of America, by and through its counsel of record, Assistant United States Attorney David Spencer, hereby stipulate as follows:

1. By previous order, this case was set for sentencing on February 13, 2025. Dkt. 97.
2. By this stipulation, defendant now moves to continue the sentencing hearing until April 10, 2025 at 9:30 a.m. The parties agree to the following schedule, with the concurrence of probation:

Judgment and Sentencing:	April 10, 2025
Reply/Statement of Non-Opposition:	April 3, 2025
Formal Objections to PSR:	March 27, 2025

Final PSR: March 20, 2025

Informal Objections to PSR: March 13, 2025

As this is a sentencing and a change of plea has already been entered, no exclusion of time under the Speedy Trial Act is required.

3. The parties agree and stipulate, and request that the Court find the following:

a) Counsel for defendant continues to work with counsel and prosecuting authorities in unrelated, pending state matters to determine whether those matters can be resolved prior to Mr. Ayon Aragon's designation to a Bureau of Prisons facility. The resolution of these matters could affect his security classification, program eligibility, and eventual halfway house placement while serving his term.

b) In addition, defense counsel is awaiting other information that is vital at sentencing.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

IT IS SO STIPULATED.

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Dated: January 17, 2025

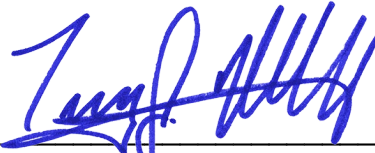
/s/ Meghan D. McLoughlin
MEGHAN MCLOUGHLIN
Assistant Federal Defender
Attorney for Defendant
JOSE SANTANA AYON ARAGON

Dated: January 17, 2025

/s/ David Spencer
DAVID SPENCER
Assistant United States Attorney

FINDINGS AND ORDER

IT IS SO FOUND AND ORDERED this 17th day of January 2025.



TROY L. NUNLEY
CHIEF UNITED STATES DISTRICT JUDGE